19-2364	19-sni Doc 2874 Filed 05/18/21 Entered 05/18/21 10:22:49 Main Document Pg 1 of 51 \sim /
	5-11-21
10:	Clerk of Court,
FROM	Mork Wolher MIOGSS
	WICC
	2500 Rate 225
	Mt Sterling TU 62353 ET
RE'	Moch Wollier MIOCSS WICC 2500 Roste 29S Mt. Sterling, III G2353 Pundue Phorma LLP # 19-23649-RDD
	Dear Clerk,
	Please e-file: MOTICN (18 pgs) = Attchment (A About (8 pgs)
	5 Attchment (A Apollot (8 pgs)
	3 Eshibits A-U
log John	
	Hopefill the Stealed Alemburs are
	O.K. that was the law Library's
	David C
	doing? That-you
	LIFOW - Z
	Romatall State
	Respectally S. bon that
	120

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In Re: Chapter II
Purdue Phorma L.P. Couse# 19-23649 (RDD)
et-all
debtors (Jointy Administerd)

MOTION FOR CONTEMPT

SANTIOUS AND OTHER

EXTRAGRDINARY ORDERS

DIRECTED AT PRISON OFFICIALS

FOR WILLTUIN, WANTONIN VIOLATING

THIS COURTS ORDER IN VIOLATION

OF THEIR OWN POLICIES AND

STANDING CASELAW

COMES NOW, Creditor Mork E. Wolker Pro-Se, AD MOVES this Horardole Court to Find Director Rb Jefferys (entity) of III. Dept of Correction (IDOC) in CONTEMPT Further ISSUIN appropriate Sontions and awarding MOUANT costs and domages and other appropriate ORDERS as the Cout deems necessary to force IDOC and its employees to follow both this Costs prior ORDER (Doc 2697) and low, for good—couse as contained here-n.

Jurisdication

Jurisdication is established under 28 USC \$\$\$ 157(a)-(b) and 1334(b) and the Amounded Storly Order of Reference M-431 dotal Jan 31st, 2021 Jurisdication is further establish by DOC 2697 data 4/22/21 Item #6

This Court retains exclusive jurisdiction to hear and determine all matters only from or related to implementation, interpettation, and ENFORCE MENT of this Order

3/18

Breif History

On Creditor, Pro-Se McUANT filed previous MOTION (DCC 2607) before this Court Show a Vestel Interest as a claiment egainst debtors and having no ability to review and object (if wormted) to the proposed Plandotal Apr 7 / 2021;

In response and with No Objections
the Cort issual (DOC, 2697) on
ORDER directly Non-porty prison officials
to allow MOVANT to across the
Cort both telephonicality and by prison
afficials retrievely various pleadings from
the NOTICING AGENT, Prime Clay LIC
pursuant to the prisons palicy's and
procedures;

3 in Prison officials (wice) have refused to fellow this Courts ORDER in its entirety, As described in detail in Attahment I Afford of More Walker;

Short History prior to Order

On Prior to this ORDER MOVANT has filed a Civil Rights lousest Walker V Scott et 11 20-CV-03155-SEM (Cortal Dist III, Fel) over disability discumstan that included criminal February of Store Records, Altry of madical records (course) and various other extensel activities by WICC efficiels. The Cout has to look no Firther than DOC 20 (In that sixt) MOT. to Leave, and Amond Carplaint ou/ Eshibits, to establish prism afficials at this facility do not feller the law - Or - thoir our peligs (See also DOC 31) Mot Compell Evidence tempering First, the pron Aloids claimed MOVAUT was not food hadler quelifel (Eshbit A,B) when In fact he was becase they didn't want to allow him to pertrapote in ICI program and earn good-time. AND in yet onother by fet lie IDOC claims there is no fool howler gool factor policis (DEC Eshibit C) their correctly evidence of their way along thats discoundite ender the Rules of Civ Proclure;

Advocan lettuers from disability attroop to prom Afroick (Exhbit d. E) were grand This established prish afficient refue to follow the law even often given NOTICE; on Aug 20, 2020; (Fahibit F) In retalliate MCUAUT is now borned from accessing priss policies in violetin of the policy (Exhibit G) MOUANT was forced to file FOIA request to recieve requested policy even though prior Africiels Mow III. low prehibite innates from FOIA prin policies FOIA Section 7 (05) (See ogen DOC 31 and Enhibit # Agon establishy prisa affords retise to Fellen their cun policis prd Further lie or the grievers (#21-0410). In retalliction for the lousuit, Deforbat Ashorat / Heath Core Administrator and dietar doctor afficier disentined MOVAUTS Special deathor ORDER diet and are impasy deprivation of Food Wheren Ashort wat into the model file both aftery and destrying medical records to cover their trads

(4) when BIP# 2 (Strulus Checks \$ 6000) showed up priso illegaly garnished MOVAUTS EIP for Film fees on Wolher cose in violation of 26 USC Section 272(d) of CAA. To which MOUANT requested his tide returnel & Wooden Greene in which she responded bosically that prism. policy trumps Frederal Low (Earlist I), a Grievare # 21-0821 was filed and prion afficiels then the de to use the Federal Court as a Paun staty they had to return the Finds first, Verbal threats of invelog the Secret Service netted response the movey acid be returned in Grenere Appeal to ARB/Dieter However, prison emplyee said greence was assured and in the passon mail back to MOVANT weeks go, MOVANT only has 30 days to file the Appeal, And it appear prison afficials are merely haging anto it artil after the 30 days runs to cheat MOVANT oct of his Appeal and Stimulis morey refund that was illesty taken,

On and My 5, 2021 MOVANT become awars that prion officials appear to be illegely runny a covert emulti-state criminal investigation against MOVANT when they have no authority or jurisdicts indo Illines Low. As Stole low designates The III. State Police as investgator of such armoral nation on behalf of the prison system. MOVANT become aware of this apparent investgation when a priso emplace brought up a fact buried in a great report 23 years ago in another State. The employee statel Remember when you told me (this) Mount NEVER discussed that fact or (this) with the prish complages enhotsever. That cose was actually dismissed over a Spoody Trick demod in 2016. in criminal acts by usy their government resource (5) to look for was to impose Firster retallicatory measures against MOUAUT over the Walker suit job with no penedigial

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Credibility of MOVANT

As a courtesy MOVANT privided a copy of this MOTICA/APAdult to Dractor Rob Jeffeys. And if this Cout BRDERS IDOC to Show Coise why they shildn't be held in contempt they will most lively try to advonce allegation MOVANT is not trithful to the Cout, to which MOVANT presents the follow evidence:

In 2000, while et Motors, State

In 2000, while et Morton State
Prish our et 150° check forgang that was
onhorced to Felong, MOVANT Filel suit to
Morton Syrone Court over condition of consiments
in what become a media spectable with
over 18 news articles. Prion afficials deviel

everythy alledged.

MOUAUT garnered a Lordmond published

38 page Opinion 6-1 Walker V State M+ 134 (2003)

over mistreatment of prisoners cuth mental illness

the Cout deemed prison officials densed him

hungen dignity, physologically tertured Walker

onay other things. Walker was prevy to be

8 tothful

A

Bo In 2012 Moudant was a named plantiff
in a class of \$5,000 lityots against Shariff
Gusman/New Orleans Janes v Gusman (atoth annital)
represented by Southern Paverty Law Center and
later USDOJ signing as Plantiffs cowel also.
In that case Sheriff signal a Settlement Agreenet
but refusal to admit in violation of requirement
of PLRA which timad into a fairness trial
where all alighters were proven true after 10 days.
Utimaty Judge Africal tookfree new
By M join wife 75 M dellar tribates
and from Sheriff and put it into Federal
control in 2016.

A side suit Wolker & Groman (citata conitted) For danger was also settled out of Court in 2016. The Court actually approved that settlerest in violetin of PLRIA as Shorrif refuel to admitt on it also as is required by law.

MOUANTS bookgrend elearly demonstrated croolish. Tity in this MOTION, As do the exhibits attended to this MOTION.

Contempt Citatura Justifiel

On This Cout ORDERED prion afficiels to put MOUANT on the phone to participate telephonically at appearing Cost hears of May 4, 2021 for example & As described in the attached Affectit of Mak Walter (Attch I) Consoler Brang after recient a e-most (presunably From Clark) went to the legal department for reason to day the phase call, Then e-molel the Cout, MOUANT wouldn't be attraly Cout hony felephonically in VICLATIONS of this Courts ORDER and WICC policy on legal colls. First of the poly octuly states Offenodos onen't allued to use correction telephones, (Ethibit III) Bot as demonstrated on Affoliot of More Wolker Iten # 13) prison officials are constrainty and repeatedly putty Offenders on the phase for legal cells now selectively imposing MOVANT be subjected to the policy as yet more retallety over Walker suit.

turthermore, there is actually some coselou or remote appearance by electronic means (telephone is electronic maons) ruled on by 7th Circuit/Appeals Cout. In Thorton & Snyder 423 F3d 690 (2005) ruled it permissable for a Pro-Se inmate litigate to litigate his civil juy trial via videoconference and further all witness (s) appearing remotely. In that case there were security concerns due to Thaters potential of escape or threat. In the case, MOVANT is a Minimum Soundy Inmits who Escape classification of Low now NONE And has not had a display writery in IDOC since 2010. (Eshbit Lin)

Prison afficials in this case simply chose chose to day MOVANT gamess to the Cout in violation of not only this Couts ander but their own policy's and caselow without any legitment penelogical purpose -

D. As for this Courts ORDER that the

prison librion (Mr. Scott Gregory) retrieve

yarrows pleadings from Prime Clerk LLC

NOTICING AGENT pursuent to prisons

policis and precedures, As clerchy documental
in Attachment I Affallust Mr. Gregory

made the decision from the start to

refuse to fellow this Courts ORDER

and wont to Connie Cosey (title whom)

to Pind just fraction to ignore thats

Courts Order,

MOUANT IS a creditor and therefore
a litigent in the Purdue mother and thus
is entitled to the pleodigis filed in
the mother by law and prison policy.

Due to Mr. Grazony's unlocall

willfully auctorly contemptous actions with
no penealizated purpose he has coused

MOUANT I repairable Injury in as for
as MOUANT was desired apparantly to review

Supplement plan and PI claim questionere and

Object (if wormted) by the Couts decolling.

See Doc 2488

12

(Eshibit M)

MOUANTS INTEREST IN PROCEED Was

MOUANT has a deeply ingrared vested interest into the construction and development of the PI claim questionine based on the following this is they he filed the agreed MOTION to the Court to protest his rights.

Dr. In orthopotin et the Cout demody Prest
of Chin MOVANT contacted Great Fells Cline
the repositery of all medical records for
Coscoole Courty, Montera whee MOVANT was
a resident from birth (1969) to 2004.
Great Falls Clinic has destroyed all
MOVANTS medical records except two doctr
wishes in 2004 for Stoph and Thrush
(Exhibits N, O, P, Q,
Plostill apoid expanse and subsquent
addiction span a time person of 1990st
restay in Ay 2001 - will 2003 timefrome.

D. MOVANT then attripted to Jeans the Phomeentical records, which has become

While in Mortana.

Impossible as Buttery's Grocery and Pharmany chain west barkrupt over a decode ago, And Public Drug burnt down and I'll MOVALIS undestandy these records were also lost.

It was imporitive that MOVANT god a peek at the PI claim questinaire to ensure it covered those type of issue(s) not just in MOVANTS case But all simularity situated claimants. And be able to file his Objector (if wanted) prison afficials have essentially cheated MOVANT out of his Constitued Ryths without provide any policys, policy numbers, nothing, just simply because they didn't feel like fallowy the Courts Order.

The Court connot even believe on, stories excuses or policy's the prism may introduce in they're defense, As they've altered, chayool, felselied the Innote Oriestation Mario (policy book) itself

The policybook was revisited on 7/2020 and synd by coty Woodn Justin Hommers (P.2) (Eshibit S,T) Now the Some 7/2020 policy book on P.2 shows Worden Briting Greene OS the Worden of the revision time also stotal on the page P. 2 (Exhibit U). Grene didn't become Woder until arend December 2020, After Homes cus promotel and Worden French was removed over some innote deaths due to stell miscodiet. So if prish afficult falsety P. 2 of the policy book, What else has been chayed and altered to undermine, tempor with evidore, in regards to all the pendy lousnits against facility whats this Court to believe?

Conclusion

Prison officials unlawfully and without any penalogical purpose have violated both this Carts Order and MOUANTS Constituenal rights from the will telly and 15 worthly

mount is entitled to a ruling of Contempt of Cout against prison officials, Dir. Jeffay's (entity) including both sortions, costs and damages as he has been irrepairabley harmed in this liteotro. Its gon to the a doily fine in lange amount (\$10,000 aday) against IDOC, and the U.S. Moshalls to ornest and detain Wordn Greene, Scott Gregory, Grey Brung For the refusal to follow this Conte Orders to get the Message acords / Understand. Prison ARoids one betting that a Judge From New York will not enforce. his Order, So they are essentially thumbing their poses at both the Court all MOVANT in this case -MOVANT opologizes for the runnoway train that this Motion has become, But he worts the Count to Filly undestand the dynamics at play at this facility and the F.B.I will most likely verify also,

WHEREFORE MOUANT projs on this Honordole Court For the Followy:

- D. BRDER Diretor Jetfay's to Show case why his depostment and employees should not be held in Costompt of Cost ?
- (2) ORDER contempt citations and southers
 against all involved prison affects and their
 entity IDOX / Dir Jeffays as this Cort
 aleems appropriate;
- 3. ORDER proson afficials pay damages and costs to MOVANT and the Court in this Contempt issue, As photocopying, postage and MOVANTS time over the Free?
- Dr. Any and all other ORDERS this Cout cleem's necessary to facilitatete Forcing prison efficiels to Faller any fall fiture Court ORDERS.

19-23649-shl Doc 2874 Filed 05/18/21 Entered 05/18/21 10:22:49 Main Document Pg 19 of 51 Doted this 8th day of May, 2021 MA Thom More Walker MIDG 55 Creditor MOVANT/ Pre-Se 2500 Rate 99 S! Mt, Sterlin, III 6233 Certificate of Service I hereby certify that on 11th day of May, 2021 I placed this attached Mayor in the U.S. mail to Clark of Cont to sever porties of interest via the Courts Pacer automoted Fly Systom? - Davis, Palk and Wardwell, LLP, Carrel For debitors - Add truly copy sent to non-party (prish officials)
Director Rob Jetlerys/IDOC P.O. Box 1927, Spry Rold 711 Mollula M10655 2500 Route 995 18 Mt. Sterly, In 62353

19-23649-shl Doc 2874 Filed 05/18/21 Entered 05/18/21 10:22:49 Main Document Pg 20 of 51 ATTACHMENT UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK Chapter 11 Case# 19-23649 (RDD) In Rez Purolue Pharma, L.P. et-cell (Jointy Adminstered) Debters AFFADAUDT OF MARK EDWARD WALKER State of Illinois 7- SS= County of Brown I hereby depose, and state the following: That I am a Claimant / Creditor in the above-entitled matter holding claims titled under numbers A. 22993 filed June 2 B., 23559

- Dan That, I am currently incorrected at Western III. Corr. Center located out Mount Storling, Illinia 62353 under Irmote # M10655;
- That, due to my inoccertian I have no access to Prime Clerk the NOTICING AGENT in this matter via either telephonically, or directly via Hamot internet at their tuelisite;
 - (DOC 2494) from Prime Clerk informy me of on Objective deciding to the Plan (DOC 2487)

 (DOC 2488) Prime Clerk provided later use U.S. Mal anlord April 18th/2021;
 - That, simulaterially and 7 /2021 I filed MOTION (DOC 2807) to this Court to participate telephonoly with upcarry Cant heavy, And Firther recieve pleady on the above-enoptional case;

- (6) That, on cred I was recipied from Counselor Gragery Broug a copy of this Courts ORDER (DOC 2697) GRANTWG My MOTION, Orderry Prison officials to A. Allow me to attend Cout have telephology, B. Print of vorious pleadys of the NOTICING AGENTS website toy librianon.
- That, an April 27/2021 I presented

 Mr. Scott Gragery the Law Librian a capy
 of this Court's Order (Dax 2697) he

 made a photocopy. Then stated he

 was refusy to follow this Courts ORDER

 unless his boss ORDER's him to do
- 8. That an approximatly I sent Wooder
 Brittney Greene (Gregory's Bass) on inmote
 Lite requestry she CRDER Mr Gregory
 to fallow this Carts CRDER, she
 never respondent;

D. That an May 5 /2021 I returned to low living on another matter and was informed
by Mr. Gregary the fellowing.

(B) He WAS NOT falling the Cont ORDER / nie

(B) That a Ms. Cossey told him not too (Casey)

(Gregary retirg to give Cossey's told

(B) Throw it in My face that Worden Greene should

him the lite I write her;

(10) That on, 5/3/2021, I was intend, by
Mr Gregar Bur courselor that he recieved
e-mail-a request I attnd the 5/4/2021
Court hear, and he contacted IDXX legal
department and Filed they told him not to
let me attnd telephonolly;

(10) That, Gregary further stated he sent e-mail book to Court (presumably) that I would not be allowed to telephonically offered the 5/4/2021 heavy -Or - any other upcomy heavys before the Court as well;

(12) In That on May 5th 2021 I did not attend said heavy telephonically due to prison officials gations grainst me?

In That on May 5th 2021 at appreximantly
2:00 p.m. I witnessel another in make
on Counselor Brown's Corrected telephone
commency a legal call. And that prom
routinely allows this even thigh it states
on P.10 of Innate Crustotan Monual that
its prohibital (Exhibit K);

That, I am the Plantill in disability

Discrimination lowerit Welker V Scatt 20-cue 03155-SEA

Cognist prison afficiels that includes violatins of

verious State and Federal laws, Felsefactions of

State Records, alteration and molestation of my

modical and prison files to cover up the anaginal

misclands, and verious other unlawful acts

not atherwise specifical by prison afficiels;

filed in Fed Court for Costal District of

Illinois (Judge Myers cough);

(15) I That, prison afficials have retallicted against me over lower't desarded in item 14 of this affolded by food deprivation to ture, denoid to account to prison policy's except thingh FOIA requests in violety of State law on such, and other retallitary actions, had atherwise specified.

became owere that prison afficiels appear to be rumon a multi-state covert criminal investigation of me for which they are not an authorized investigative agange under Illinias State Low in Forther retalliation over Walker & Scott.

(12) Lostily, that I have been irrepairable danged in the Court due to the unlowful and policy violating acts of prima afficials at Western III Constant Control three their willfel ad waster refused to fellow the Court Order (DOC 2697).

Affaint

I declare under peralty of Penjay that facts and statements contained in this my Affaciant of Mork F. Walker are true and correct to the best of my knowledge and understooding, as to the events, as they occurred at the time,

Morie E. Walker MI0655

WICC

2500 Route 995

Mt. Sterling, JII 62353

Subscribel and Swam before me on this 5th day of MAY 2021

Notey Public

SCOTT GREGORY OFFICIAL SEAL Notary Public - State of Illinois My Commission Expires Jul 15, 2024

Certificate of Service

I hereby certify that a 11th day May, 2021, I served portion of interest view the Courts PACER outmoted filing system by U.S. maily the the Clerk of Court this Alledut to e-file, anto the system:

- Davis, Polk, and Wordwell LLP, Coursel for Debtors -

I Futher certify non-paties (prish officials)
have been served via U.S Mail directed
to i Director IDGC Rob Jeffay's
P.a. Box 19277
Sprzyfield, III. 62794

Mark Walker MIOGSS WICC 2500 Roxte 99 S. Mt. Sterling III 62353

Exhibit

WALKER, MARK

ADA MEDICAL LEGALLY BLIND Issued On: 2/21/2019

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Exhibit B

Bruce Rauner GOVERNOR

ILLINOIS CORRECTIONAL INDUSTRIES

Western Illinois Correctional Industries/2500 Rt. 99 South / Mt. Sterling, IL 62353 / Telephone: 217-773-4441

MEMORANDUM

DATE:

February 26, 2020

TO:

Walker, M10655

4-D-19

FROM:

Heidi Scott

Superintendent of ICI - Western

SUBJECT: REQUEST

Be advised we have received your request for an Industry assignment. After reviewing your Illinois Department of Corrections records and history it has been determined that you do not meet the criteria for an industry assignment at this time due to not being a qualified food handler. My recommendation is to set up a meeting with your counselor or health care regarding the designation of not being a "qualified food handler" so you have a better understanding as to what this means and if it is at all possible to change. Until you become a qualified food handler, I urge you to continue applying for other assignments and taking additional college courses as this can only benefit you in the long run. Degrees and educational credits are something no one can ever take away from you.

Please resubmit your request once you are no longer pay restricted.

19-23649-shl Doc 2874 Filed 05/18/21 Entered 05/18/21 10;22:49 Main Documer

JB Pritzker
Governor



Eshibit

Rob Jeffreys Acting Director

The Illinois Department of Corrections

1301 Concordia Court, P.O. Box 19277 • Springfield, IL 62794-9277 • (217) 558-2200 TDD: (800) 526-0844

March 25, 2021

Mark Walker, M10655 Western Illinois Correctional Center 2500 Rt. 99 South Mt. Sterling, IL 62353

Re: Freedom of Information Request #210318215

This letter is in response to your request to the Illinois Department of Corrections ("IDOC") pursuant to the Illinois Freedom of Information Act, 5 ILCS 140/1, et seq.

You have requested written documents or records of the requirements for inmate to be food handler qualified.

Response: IDOC does not possess or maintain records responsive to this request.

In the event you view this response as a denial of your request, you have a right to have the denial reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(a). You can file your request for review with the PAC to:

Public Access Counselor Office of the Attorney General 500 South 2nd Street Springfield, Illinois 62706

You also have the right to seek judicial review of your denial by filing a lawsuit in the state circuit court, pursuant to 5 ILCS 140/11.

If you choose to file a request for review with the PAC, you must do so within 60 calendar days of the date of this denial letter (5 ILCS 140/9.5(a)). Please note that you must include a copy of your original FOIA request and this denial letter when filing a request for review with the PAC.

Sincerely,
Maggie Meikle
Freedom of Information Officer

Mission: To serve justice in Illinois and increase public safety by promoting positive change in offender behavior, operating successful reentry programs, and reducing victimization.

www.illinois.gov/idoc



Advancing the human and civil rights of people with disabilities

SELF-ADVOCACY ASSISTANCE & LEGAL SERVICES & DISABILITY RIGHTS EDUCATION & PUBLIC POLICY ADVOCACY & ABUSE INVESTIGATIONS

Creditor Exhibit

January 22, 2021

By USPS and Fascimile Brittany Greene, Warden 2500 Rt. 99 South Mount Sterling, IL 62353 Fax: (217) 773-2202

Re: Mark Walker # M10655

Dear Warden French:

I am writing to provide you with a copy of a letter we sent to the previous warden regarding Mr. Walker. We understand that Mr. Walker continues to be denied employment with the Illinois Correctional Industries (ICI) program due to his disability. This raises serious concerns under federal laws that prohibit discrimination against people with disabilities and require reasonable accommodations where necessary to prevent their exclusion from programs such as this.

I am attaching a letter dated August 20, 2020 that was sent to the previous warden, Mr. Hammers, about this matter. We again ask that attention be given to this issue immediately.

Thank you for your time and consideration.

Sincerely,

Amanda Antholt Civil Rights Team

Enclosure: 8/20/2020 Letter from Equip for Equality to IDOC

cc: Mark Walker (by mail)

Anne Rayhill, IDOC Legal Counsel (by email)

THE INDEPENDENT, FEDERALLY MANDATED PROTECTION & ADVOCACY SYSTEM FOR THE STATE OF ILLINOIS

Mark P. Rotatori, Board Chairperson Zena Naiditch, President & CEO

MAIN OFFICE: 20 N. Michigan Avenue, Suite 300 🕏 Chicago, IL 60602 🕏 Email: contactus@equipforequality.org 🕏 Tel: (312) 341-0022

TOLL FREE: (800) 537-2632 ★ TTY: (800) 610-2779 ★ FAX: (312) 541-7544 ★ MULTIPLE LANGUAGE SERVICES

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Advancing the human and civil rights of people with disabilities

SELF-ADVOCACY ASSISTANCE ★ LEGAL SERVICES ★ DISABILITY RIGHTS EDUCATION ★ PUBLIC POLICY ADVOCACY ★ ABUSE INVESTIGATIONS

August 20, 2020

By USPS

Justin Hammers, Warden Kathy Ashcraft, ADA Coordinator Western Illinois Correctional Center 2500 Rt. 99 South Mount Sterling, IL 62353

Anne Rayhill IDOC Legal Counsel Springfield, Illinois (by email)

Re: Mark Walker, IDOC # M10655

Dear Warden Hammer and ADA Coordinator Ashcroft and Legal Counsel Rayhill,

I am writing on behalf of Mark Walker, IDOC # M10655, currently incarcerated at Western Illinois Correctional Center. Mr. Walker is blind and has a mental illness. He is therefore a person with disabilities within the meaning of the Americans with Disabilities Act. Mr. Walker has repeatedly applied for the Illinois Correctional Industries (ICI) program at Western but has consistently been denied, apparently due to his disabilities.

Equip for Equality is the designated protection and advocacy system for the State of Illinois, charged with protecting the rights of Illinois residents with disabilities. As such, we write with grave concern that IDOC is violating federal law by excluding Mr. Walker from the industries program because of his disabilities.

When Mr. Walker first arrived at Western Illinois CC in January 2019, he applied for the ICI program so that he could learn a trade while also earning good time credit. He appeared to meet the eligibility criteria for the program: he had been at the facility for at least 30 days, was within 1-10 years of his release, was classified as minimum security and on A-grade status, and had not been in segregation in the previous 90 days. He believed that he was not pay-restricted, given that his TABE score was higher than the minimum required to be eligible for state-pay employment.

But in June 2019, when Mr. Walker's name came up for the program, he was denied a position in the industries due to "not meeting the criteria." No further explanation was given to him about which criteria he did not meet.

THE INDEPENDENT, FEDERALLY MANDATED PROTECTION & ADVOCACY SYSTEM FOR THE STATE OF ILLINOIS

JOHN K. HOLTON, Ph.D., BOARD CHAIRPERSON ZENA NAIDITCH, PRESIDENT & CEO

MAIN OFFICE: 20 N. MICHIGAN AVENUE, SUITE 300

CHICAGO, IL 60602

EMAIL: CONTACTUS@EQUIPFOREQUALITY.ORG

TOLL FREE: (800) 537-2632

TTY: (800) 610-2779

FAX: (312) 541-7544

MULTIPLE LANGUAGE SERVICES

Page 2 August 20, 2020

Mr. Walker then reapplied for the program, and when his name came up again in February 2020, he was again denied. The memorandum he received from Superintendent Scott stated that he was denied due to not being a "qualified food handler." Superintendent Scott encouraged Mr. Walker to speak with his counselor or health care to determine why he was not qualified as a food handler. Superintendent Scott also informed him that he was "pay restricted," and would not be able to begin a job in industry until he was no longer pay restricted.

Mr. Walker followed Superintendent Scott's advice and wrote a kite to the healthcare staff asking why he was not food qualified. The response he received was that he was, in fact, qualified. He spoke with his counselor, who confirmed that he is listed as "pay restricted," but was unable to determine why. As previously stated, Mr. Walker has taken the TABE and earned above the minimum score required to qualify for a job earning state pay.

Still unable to understand why he had been denied the industry position, Mr. Walker then submitted a grievance on this issue. The response he received indicates that he had been denied a position in industry is due to his vision impairment. Indeed, the grievance response states, in relevant part:

ADA coordinator Mrs. Ashcraft stated on 04/14/2020, for this offenders safety, he could not be assigned to ICI due to his status of being legally blind. There are knives, saws and presses in ICI that would need to have a keen eye on at all times during operation. I truly would be afraid for this offenders safety and well-being if he was to be put in ICI. ...

This response suggests that the prior justifications given—that he was pay restricted and not qualified to be a food handler—were merely pretext for discrimination based on Mr. Walker's disability. Moreover, the ADA Coordinator's response demonstrates just the sort of paternalistic judgment that the Americans with Disabilities Act was intended to dispel.

The very purpose of the ADA's requirements in the employment and programmatic context are to stop paternalistic views about the abilities of people with disabilities. It is incorrect to assume that someone who is blind cannot work in industry—in fact, Mr. Walker has worked in food service at prisons in other states prior to his incarceration at the IDOC. People with disabilities, including those who are blind, work in all sectors, including in industries and culinary arts.

The Americans with Disabilities Act requires that access to the programming available within the IDOC, including educational and vocational programs, must be equally available to persons with disabilities as to non-disabled people. It is a violation of Title II of the ADA to exclude persons with medical or mental health needs from vocational programs offered by the IDOC merely because they have a disability. See 42 U.S.C. § 12132 (explaining that "no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by such entity"). The Rehabilitation Act provides similar protections for people with disabilities in this context. 29 U.S.C. §794(a) ("No otherwise qualified individual with a disability in the United States.... shall, solely by reason of her or his disability, be excluded from

Page 3 August 20, 2020

the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency").

To the extent Mr. Walker's disabilities require accommodation in order for him to participate in the ICI program, it is a violation of the law to not make "reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability." 28 C.F.R. § 35.130(b)(7).

In a case similar to this one, Jaros v. Illinois Dep't of Corr., 684 F.3d 667 (7th Cir. 2012), the U.S. Court of Appeals for the Seventh Circuit found that a prisoner who walked with a cane stated a claim against the IDOC under the Rehabilitation Act for his exclusion from a work release program. Like Mr. Walker, that prisoner met the eligibility requirements of the program: he was within two years of his release date and classified as minimum security. But Jaros was denied transfer to a work-release program because of a "medical hold" on his file, solely because he used a cane. When he tried to contest the medical hold, Jaros was told that he was "appropriately placed." The Court of Appeals found it plausible that the Department's "appropriately placed" rationale was pretext for discrimination, and allowed his claim for disability discrimination to go forward. Here, the pretext has already been dispelled. The basis for Mr. Walker's exclusion from the employment program was his disability.

We are writing to ask that attention be given to this matter immediately. As a result of denying him access to the ICI program, Mr. Walker already has lost out on over a year's worth of pay (estimated between \$2400 and \$3600) and several months of good time credit, all potentially due to his disability.

We ask that Mr. Walker be approved for the ICI program as soon as possible. To the extent that any reasonable accommodations must be made to allow him to participate in the ICI work, we ask that the ADA Coordinator communicate with him directly to better understand his needs including how he can work safely in Industries. We are also happy to be resources and provide information regarding some of the workplace accommodations sometimes utilized to provide equal treatment of blind employees.

Thank you for your attention to this concern.

Sincerely,

Amanda Antholt Civil Rights Team

cc: Mark Walker

IDOC Legal Counsel Anne Rayhill (by email)



Advancing the human and civil rights of people with disabilities

SELF-ADVOCACY ASSISTANCE ★ LEGAL SERVICES ★ DISABILITY RIGHTS EDUCATION ★ PUBLIC POLICY ADVOCACY ★ ABUSE INVESTIGATIONS

January 22, 2021

Privileged LEGAL Correspondence Mark Walker, M10655 2500 Route 99 South Mt. Sterling, IL 62353

Dear Mr. Walker:

Thank you for your letter to Equip for Equality ("EFE") dated November 17, 2020. You requested that we send our prior advocacy letter regarding your employment at the ICI program to the new warden. You also had questions about your case *Walker v. Scott*, 3:20-cv-03155-SEM and asked for legal representation.

We have forwarded the current warden, Brittany Greene, the advocacy letter that we sent on your behalf on August 20, 2020. Enclosed is a copy for your reference.

Unfortunately, EFE cannot provide legal representation on *Walker v. Scott*. I understand that you have written to five attorneys from our Civil Rights Attorneys list, but only one of them has replied. We encourage you to continue writing to more attorneys. In your letters, it would be helpful to reference that your ADA claim survived merit review. Even if attorneys deny representation, it will be beneficial to demonstrate to the court your attempts to hire counsel by providing the letters of denial. Although the court denied your motion for recruitment of counsel in the merit review, it may reconsider upon your compliance in making reasonable attempts to obtain counsel and attaching the responses received.

To respond to some of your specific concerns about the court's decision:

- 1. As you described, the court's decision does seem to conflate the ADA and constitutional claims, but this will likely be resolved as the case moves forward.
- 2. The proper defendant in an ADA case is the public entity and not individuals. For an ADA claim in IDOC, the named defendant should be the Director of IDOC, Rob Jeffreys. More information regarding legal claims under the ADA or Rehabilitation Act is provided in the fact sheet.

At this point, we have provided you with all of the information that we have agreed to provide on this particular issue. Pursuant to our standard operating procedures, I am enclosing a copy of EFE's grievance brochure. We wish you well.

Sincerely,

Amanda Antholt Civil Rights Team

Enclosures: Letter to Warden French, Walker v. Scott Merit Review, ADA Fact Sheet, Grievance Brochure

THE INDEPENDENT, FEDERALLY MANDATED PROTECTION & ADVOCACY SYSTEM FOR THE STATE OF ILLINOIS

MARK P. ROTATORI, BOARD CHAIRPERSON ZENA NAIDITCH, PRESIDENT & CEO

MAIN OFFICE: 20 N. MICHIGAN AVENUE, SUITE 300 → CHICAGO, IL 60602 → EMAIL: CONTACTUS@EQUIPFOREQUALITY.ORG → TEL: (312) 341-0022

TOLL FREE: (800) 537-2632 * TTY: (800) 610-2779 * FAX: (312) 541-7544 * MULTIPLE LANGUAGE SERVICES

JB Pritzker, Governor James L. Bennett, Director

September 14, 2020

Mark Walker (M10655) 2500 Rte. 99 South Sterling, IL 62353

Re: Control Number: 20M0520.02
Respondent: Illinois Department of Corrections Mt.
Western Illinois Corrections

Dear Complainant:

After considering your communication it appears that a charge of discrimination cannot be filed with the Department of Human Rights for the reason(s) indicated below:

- 1. ___ The Human Rights Act requires that a charge of discrimination be made within 300 days of the alleged civil rights violation (180 days if the violation took place before June 8, 2018). Your communication was not mailed or received within that period.
- 2. ___ The Employer you are accusing of a violation of the Human Rights Act employs fewer than 15 employees.
- 3. X The Employer or Entity you are accusing of a violation is not subject to the provisions of the Human Rights Act.
- 4. ____ You have not claimed that you were discriminated against because of a protected basis. The Human Rights Act prohibits discrimination on the basis of race; color; religion; sex; national origin; ancestry; age (40 and over); marital status; physical or mental disability, unrelated to ability to perform the job; military status; sexual orientation (including gender identity); unfavorable military discharge; sexual harassment; arrest record; citizenship status; order of protection status; willful interference; (retaliation for having openly opposed unlawful discrimination); and aiding, abetting, compelling or coercing a person to discriminate based on any of the categories mentioned.
- 5. X OTHER: 1. The Illinois Department of Human Rights does not have jurisdiction over prison facilities.
 - 2. Please contact a private attorney to file a lawsuit against the Illinois Department of Corrections for violating your Federal ADA Rights during your incarceration.

The Department has closed your file. However, if you still believe that you have a charge of discrimination within this Department's jurisdiction, you must write to us within ten (10) days of receipt of this letter explaining your reasons. For your convenience, our fax number is (312) 814-6251. Always be sure to refer to your control number when writing.

Hector M. Sanchez

Human Rights Investigator Intake UnitIN2Rev. 4/19

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Rules and Regulations

F.

Fundamental to the successful operation of the Western Illinois Correctional Center is the need for both offenders and staff to follow all established rules, bulletins, policy statements, and Department Rules (available in the Library). Copies of appropriate and applicable Warden's Bulletins are located in the living units and library. Your counselor will be able to assist you with any questions that you may have. While all of the Department Rules are important, ones to which you should pay particular attention are:

Diminution of Sentence, DR 107B

Statutory Good Time, DR 107B

Program Sentence Credits, DR 107B

Meritorious Good Time, DR 107C

Program Sentence Credits, DR 107F

Assignment of Committed Persons, DR Part 420

Library Services and Legal Materials, DR 430

Committed Persons' Business Ventures, DR 445

Disposition of Contraband, DR 501C

Personal Cleanliness and Grooming for Offenders, DR 502B

Clothing, Bedding and Linen, DR 502C

Classification and Transfers, DR 503B

Administration of Discipline (Maintaining Good Order) DR Part 504A and Table A

Segregation, Investigative Confinement and Administrative Detention – Adult, DR504D

Grievance Procedure for Offenders, DR 504F

Grievance Procedure for Releases, DR 504G

Rights and Privileges, Visitation, DR525A

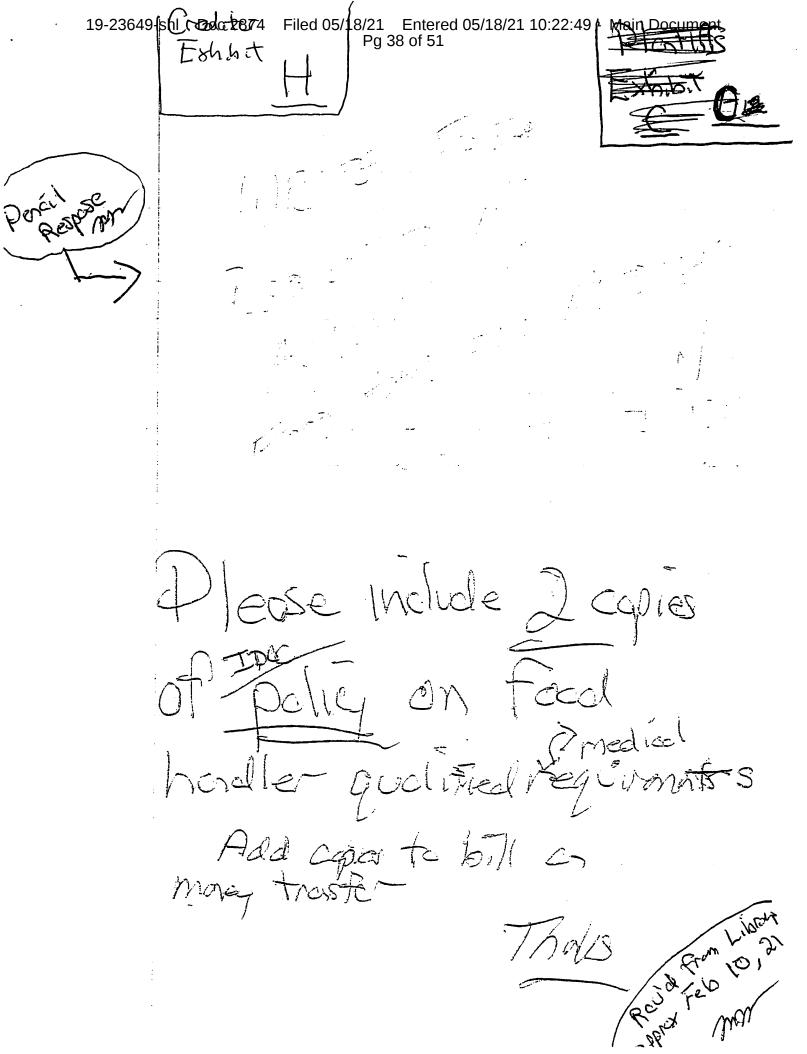
Rights and Privileges, Mail and Telephone Calls, DR 525B

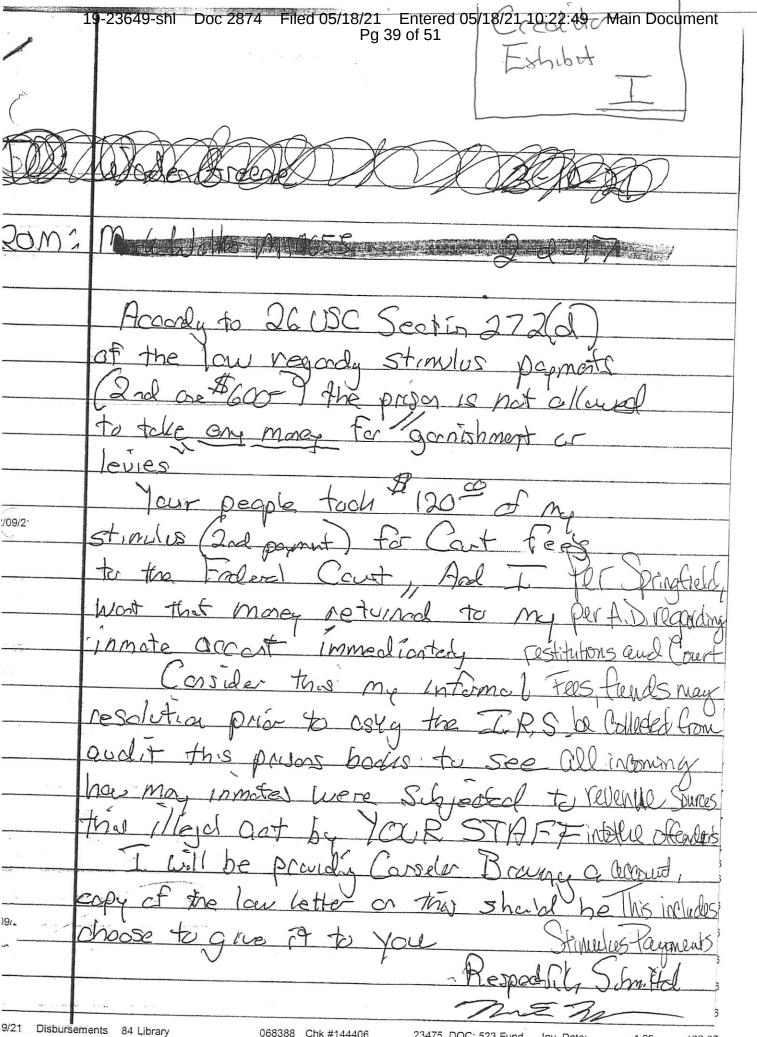
Rights and Privileges, Publications, DR525C

Rights and Privileges, Marriage, DR525D

Personal Property, DR 535

Inmate Orientation Monol)





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State of Illinois - Department of Corrections

Counseling Summary

IDOC # M10655

Counseling Date 03/16/21 09:46:32:303

Offender Name WALKER, MARK

Type Collateral

Current Admit Date 11/19/2018

Method Grievance

MSR Date 09/22/2023

Location WIL CLINICAL SERVICES-YARD OFFICE

HSE/GAL/CELL 02-D -17

Staff CRARY, LORI L., Office Coordinator

Grievance office received grievance #21-0821 regarding trust fund, dated 3/11/2021. Forward to counselor for response.

Stale moral

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31. Offenders shall be allowed to make collect phone calls to relatives file calls are not allowed. To

31. Offenders shall be allowed to make collect phone calls to relatives, friends, or attorneys. Third party calls are not allowed. Telephone calls shall be limited to twenty (20) minutes in duration and access shall be available only after 7:15 a.m. count and until 9:30 p.m. Calls in segregation shall be limited to 15 minutes in duration, if in grade. Calls must not interfere with regular institutional routines and will be terminated during counts.

In order to use the offender telephone system in the housing units, you must submit a Telephone Number Request Sheet with no more than 30 numbers to the Counselor. In addition, you must use your personal identification number, when prompted, after dialing a number. Telephone calls are subject to monitoring and recording at any time.

You may place calls to a licensed attorney by checking the legal call box on the Telephone Number Request Sheet, provided Western Illinois Correctional Center is able to verify that number as belonging to a licensed attorney, the call will not be monitored and not be recorded.

If you experience difficulty with the offender telephone system, you can process an Offender Telephone System Trouble Report form, which will be forwarded to the Telephone System Administrator.

Friends and family of offenders may call 1-800-844-6591 for customer service, rate information, or any other questions.

- 32. Offenders are prohibited from using Correctional Center telephones.
- 33. Offenders are expected to be fully dressed (i.e., shoes/boots, shirt and pants, with belts buckled), when leaving the housing unit. Shirts must be fully buttoned to the second button down from the collar and tucked in. Pants should be worn at waist level. Offenders going to assignments and/or entering the Visiting Room for a visit will be required to wear a state blue buttoned shirt and blue pants.
- 34. When offenders are in their housing units, including dayroom activity, informal dress is authorized. Bathrobes, gym shorts and tee shirts are permissible. No towels or underwear will be worn in the dayroom, or on the landing areas. Shoes and/or shower shoes must be worn any time an offender leaves his room. No plastic type headgear will be worn out of the housing unit.
- 35. Offenders are required to wear a state blue shirt as well as state blue pants on their respective assignments. The exception will be those offenders assigned to Dietary, Commissary, Maintenance, Clothing, Laundry, Warehouse and other assignments requiring jumpsuits. State blue clothing is not to be worn under jumpsuits. Religious clothing and/or headwear cannot be worn except in the cell or the Chapel.
- 36. No state clothing will be altered from its original state.
- 37. Offenders entering Dietary for meals are required to wear state issued blue pants and shirts. No tank tops or shirts without sleeves will be allowed.
- 38. Offender workers will be allowed to wear their issued jumpsuits when on duty. Industry workers will be allowed to wear their work clothes when reporting to the Dining Room when they are on duty.
- 39. One pre-packaged items such as potato chips or cookies may be taken from the serving line back to your living unit if you choose not to eat those items in the dining room. Food items are to be wrapped and sealed when being stored in an offender's room. NO FRUIT, MILK, OR OTHER BEVERAGES MAY BE TAKEN FROM THE DINING ROOM.

-13- EInmote Orsettetia Marcal

Ovant Jul 2000

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OERCP101



ILLINOIS DEPARTMENT OF CORRECTIONS Offender 360 PRINTED SCHED. CALL PASS



PAGE: 100

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ILLINOIS	DEPARTMENT	OF	CORRECTIONS - OTS	ċ

OFFENDER CALL PASS ISSUED IDOC: M10635 WALKER, MARK Minimum WIL:WIL:04:D:19:L 1; PRIMARY: UNASSIGNED , PARTICIPANT-WIL710010009 DESTINATION: HOUSE 04 DAY: 6/3/2020 AT: 9:20:00 AM

AUTHORIZED:	Aubri Shawgo
COMMENTS:	MANDATORY TELEPSYCH: IN-HOUSE (DR. MERMIGAS)
PASS TYPE:	TELEPSYCH

CELL HOUSE SIGNATURE: TIME: ____:__ DESTINATION SIGNATURE: TIME: ____:___ EXIT SIGNATURE: TIME: ____:___ RETURN SIGNATURE: TIME: ___:_

Pg 68 of 213

filed as part of the Plan Supplement. The TDP sets out the criteria for determining the eligibility and qualification for allowance of each opioid-related personal injury claim, as well as the evidence that the claims administrator may consider in making such determinations.

Approximately 130,000 opioid-related personal injury victims filed claims in the Chapter 11 Cases. The TDP provides a fair and expeditious process for evaluating those claims and providing holders of qualifying opioid-related personal injury claims with compensation. The TDP resolves opioid-related personal injury claims in a way that is equitable and reasonable given the finite amount of funds available to satisfy such claims. To participate in the TDP process, holders of opioid-related personal injury claims will complete and submit a claim form and an executed HIPAA form (each in the form attached to the TDP) to the claims administrator.⁴⁷ Holders of opioid-related personal injury claims who (i) submitted a Proof of Claim in the Chapter 11 Cases, and (ii) show that they or their injured family member(s) were prescribed and used a Purdue opioid listed on Exhibit A to the TDP, are eligible to receive a settlement payment from the PI Trust. Claimants who used only opioids manufactured by companies other than the Debtors will not be eligible or qualified to receive a settlement payment from the PI Trust. The TDP outlines several ways that individuals can show their eligibility, including through prescription or pharmacy records. It also provides a way for holders of opioid-related personal injury claims who cannot retrieve their prescription or pharmacy records to show that they are eligible to receive a settlement payment from the PI Trust. For a complete description of qualifying Purdue products and evidentiary requirements, you should carefully review the TDP, which will be included in the Plan Supplement filed with the Bankruptcy Court and served on applicable parties.

The claims administrator will value eligible opioid-related personal injury claims based on a scoring grid that uses objective metrics to assign a certain number of points to different compensable injuries. The points will ultimately be translated into dollar amounts, to determine the settlement amount payable for specific compensable injuries.

The scoring grid, detailed in the TDP, was developed using statistical sampling and modeling performed by financial analysts and experts, based on scoring grids developed in comparable cases, and with unique customization based on the injuries suffered by victims of Purdue's opioid products and activities related thereto. The chart below summarizes the scoring grid:

⁴⁷ Executing a HIPAA form will allow the claims administrator to obtain the medical records of the holder of an opioid-related personal injury claim directly. This will allow the claims administrator to investigate the validity of claims and prevent fraud while reducing the burden on individual claimants. At no point will the claims administrator share claimants' confidential health information with any other person for any other purpose.

Doc 2874 Filed 05/18/21 Entered 05/18/21 10:22:49 Main Document Lillinois Propagation of Selease of Offender Medical Health Information 51

This Authorization may not be used for mental health or substance abuse treatment information (use form DOC 0240)

organizations that are not health plans, covered health care providers or health care information privacy laws, they may further disclose the protected health information. information disclosed pursuant to this authorization may not be further disclosed exc	clearinghouses subject to federal health
I hereby authorize Great Falls Clinic	•
Facility specific medical health information to be disclosed including date(s) or date range)	to release the following information: (State
- All medical remark from 1988-19	93
- All medical records from Au 200	1 2000
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records exist at all need verification of the	-Or what does exist
	co and records
At Request of Offender and/or: TCT CXSTM COUNT CO	1) Themselle
from the records of Made Educal Walker	S9N 517-94-8726
ID# Print Offender	's Name
to: Self Authorized Attorney Health Care Facility Other:	The state of the s
Name Morte Woller MICKS	D.08
Print Name	
Address: 500 Route 995.	
Mt. Sterling Street Address	62353
City	ate ZIp Code
I hereby release and hold harmless, the State of Illinois, the Department of Corrections may occur as a result of the disclosure or dissemination of the records or information of permitted to the authorized attorney, health care facility, other as specified, or self. Recording information including HIV disease information. I understand that I have the right prior to disclosure by giving written notice (witnessed by someone who knows my identifications).	ords disclosed may contain confidential
Expiration: This authorization will expire (complete one):	hill Con
45 days from date of signature	Armal
Upon the occurrence of the following event (must relate to the individual or pur	200 4 202n
writer withdrew to on me	pose of the authorization):
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Signature of Offender or Person Authorized to Consent Relationship	
	/ Date /
Give Offender a copy if DOC made the request for re	Naga
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Eshibit
Date: August 4, 2020
Regarding Patient: Walker, Mark To Whom It May Consorn
To Whom It May Concern,
We cannot process your request for copies of health information for one or more of the following reasons.
The patient cannot be identified has having been a Great Falls Clinic patient. Please provide additional information such as date of birth or other identifying information.
The patient was not seen during the time period of as requested.
The patient was not seen at the facility or by the provider that was requested.
The records requested have been destroyed as allowed by state and/or federal statute.
Our records indicate that the records requested were already sent on
The authorization signed by the patient appears to have been altered. Correction tape or fluid voids the authorization.
The authorization is electronically signed. Great Falls Clinic requires an original signature in order to assist in confirming the patient's identity.
The authorization does not meet the requirements of a valid authorization as defined by HIPAA Privacy regulations (164.508(c)). Please have the attached/enclosed authorization FULLY completed by the patient or their legal representative.
The request cannot be completed without one or more of the following documents
Copy of death certificate and/or letter of appointment of personal representative
Copy of Healthcare Durable Power of Attorney
Other papers indicating the right to obtain medical records
Other:
Please contact the Health Information Management Department at the Great Falls Clinic at 406-771-3106 with any questions.
Thank you,
Great Falls Clinic Health Information Management Release of Information

LLINOIS DEPARTMENT OF CORRECTIONS

Fap 406-771-3047

Authorization for Release of Offender Medical Health Information

This Authorization may not be used for mental health or substance abuse treatment information (use form DOC 0240)

infor	epartment of Corrections will not condition treatment on this authorization. If authorizing disclosure to persons or izations that are not health plans, covered health care providers or health care clearinghouses subject to federal health lation privacy laws, they may further disclose the proxicted health information. However, genetic testing or HIV/AIDS ation disclosed pursuant to this authorization may not be further disclosed except pursuant to authorization.	1
	to release the following information replaced including date(e) or date page)	in: (Surg
	40-41 Medical Bounds	
	Request of Offender and/or:COC Dr. Trusaudus /	
from t	e records of M 10655 Mank Walter D.O.B. 3	8/6
to: [Self Authorized Attorney Health Care Facility Other:	
N	me:	•
	Print Namo	-
^	Stract Address	
•	City Sinto Zip Codo	
uedics medics	release and hold hamless, the State of Illinois, the Department of Corrections, and its employees from any liability what as a result of the disclosure or dissemination of the records or information contained therein resulting from the access to the authorized attorney, health care facility. Other as specified, or self. Records disclosed may contain confidential information including HIV disease information. I understand that I have the right to revoke this authorization at any time flauluments by girling written notice (wirnessed by acmeene who knows my identity) to the prison Facility Privacy Officer. This authorization will expire (complete one):	88
	46 days from date of signature	
	upon the occurrence of the tottowing event (must relate to the individual of purpose of the authorization):	
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* 6	reduce of Official or Parison Authorized to Conservi Relationship	~
	Citys Offenser a copy if DOO made the request for release.	

FAX COVER SHEET

DATE: Great Falls Clinic

TO:

FAX#: 406 771 3047

FROM: (myl)

WESTERN ILLINOIS CORRECTIONAL CENTER

2500 KOUTE 99 SOUTH

MT. STERLING, IL 62353

PHONE: 217-773-4441

FAX: 217-773-2365

Walken W10655

L. Crawford @

NUMBER OF PAGES BEING TRANSMITTED:

CONFIDENTIALITY NOTICE: CONFIDENTIAL HEALTH INFORMATION ENCLOSED

Protected Health Information (COLV) is a control of the confidence of th

Protected Health Information (PHI) is personal sensitive information related to a person's health care. Faxed PHI is sent only after appropriate anthorization from the patient or circumstances that do not require patient authorization. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Re-disclosure without additional patient consent or a permitted by law is prohibited. Unauthorized re-disclosure or failure to maintain confidentiality could subject you to penalties described in federal and state law.

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501 HOUDAY DRIVE | FOSTER PLAZA FOUR | PITTSBURGH, PA 15220 | P: 412-937-8590 | F: 412-937-8599 | WWW.MEXFORDHEALTH.COM



GREAT FALLS CLINIC, LLP

MEDICAL RECORDS 1400 29TH Street South Great Falls, MT 59405 (406) 771-3106



FAX COVER SHEET

FAX NIIMRRR (406) 771-3047

FAX NUMBER (406) 771-3047
Date: (1) 5 2020
To: Western Illinois Correctional Center
Attn: Crawford / Dr. Trusewyel
From: Cystal L. / HIM Dept "
Total number of pages, including this cover page: 30
If you do not receive any of the following pages, please call our office at (406)771-3106
comments: Rewids 1989-1990 W/GFC
The do not have records for
That time de la cordi- or
- The frame. Sorry
Confidentiality Notice: This facsimile transmission is intended only for the address named above. It contains information that is privileged, confidential or otherwise protected from use and disclosure. It you are not the intended recipient, you are hereby actified that any review, disclosure, copying or dissemination of this transmission or the taking of any action in reliance on its contains or other use is strictly prohibited. If you have received this transmission in error, please notify us by telephone immediately so that we can arrange for it to be returned to us. Thank you for your cooperation.
you tor your cooperation.

MW.





Exhibit

Welcome to Western Illinois Correctional Center. This facility was newly constructed and opened during April, 1989. The basic design is similar to the designs of Shawnee, Danville, and Hill Correctional Centers with the concept of a fewer number of buildings combining many programs and operational issues under one roof, but maintaining their unique and separate identity.

This manual has been prepared for you. It will serve as a guideline to the rules and regulations, organization, Programs and Services of this institution. Your first responsibility is to read it in its entirety. You should be familiar with its contents. Your next responsibility is to follow the established rules thereby creating a safe and secure environment. Such an environment will allow each of you to make choices for a productive stay with us. Offenders are assigned to this facility with the expectation that they do not need the rigid security requirements of a maximum-security facility. It is your responsibility to avoid disruptive and negative behavior.

It is the intention of the staff to provide a secure and humane institutional environment based upon understanding and fairness. You can make a contribution to a better living situation by avoiding conflicts with other offenders and staff, by taking care of your authorized property and by being conscientious on your work assignment. Program opportunities and a variety of leisure time activities are available for your participation.

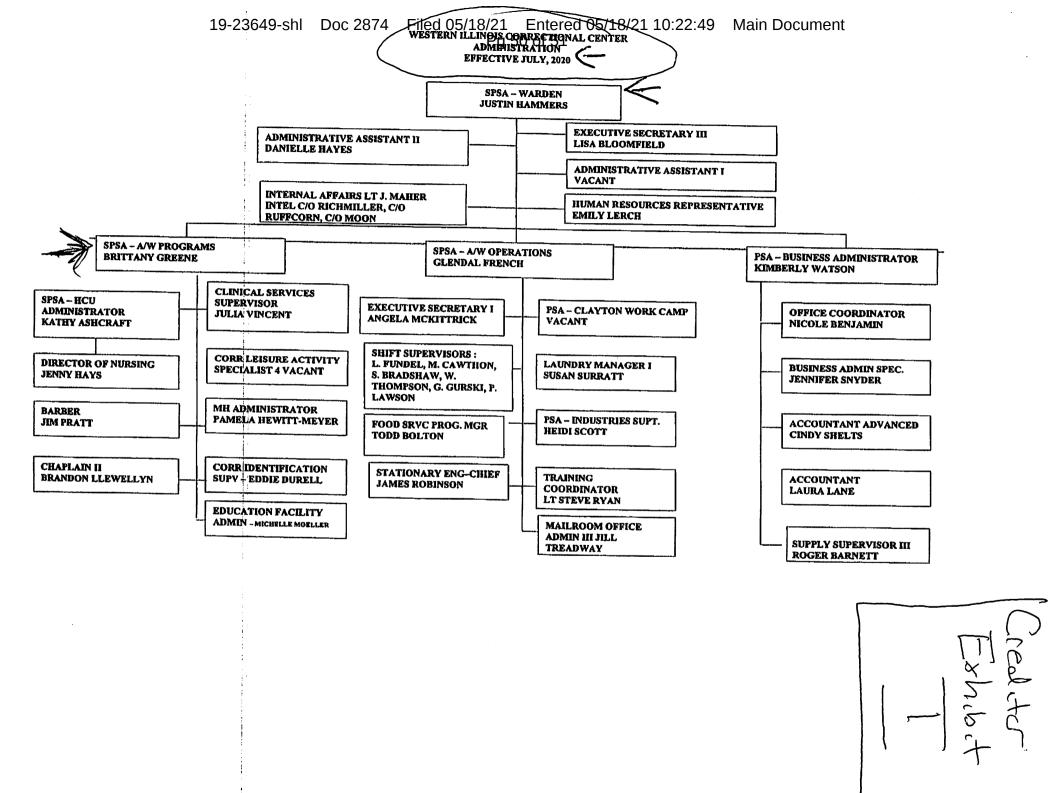
If you begin experiencing problems of any nature, you should talk to your housing unit officer, your counselor, your assignment supervisor, the shift commander or some other appropriate staff person in an attempt to resolve the problem.

Justin Hammers, Warden Western Illinois Correctional Center

Revised 07/2020



2. Innete Orientatione Majuel (exempt)



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separate identity

Revised 07/2020

Western Illinois Correctional Center



Welcome to Western Illinois Correctional Center. This facility was newly constructed and opened during April, 1989. The basic design is similar to the designs of Shawnee, Danville, and Hill Correctional Centers with the concept of a fewer number of buildings combining many programs and operational issues under one roof, but maintaining their unique and constructed the concept of the concept of

GENERAL INTRODUCTION

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If you begin experiencing problems of any nature, you should talk to your housing unit officer, your counselor, your assignment cupervisor, the shift commander or some other appropriate staff person in an attempt to resolve the problem.

Anttony Greens, Warden Western Illinois Correctional Center



Offender Orientation Manual

Mt. Sterling Illinois

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